

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Eric Greenberg,

Plaintiff,

-vs-

Hudson Bay Master Fund Ltd., Iroquois Master Fund Ltd., American Capital Management LLC, GRQ Consultants, Inc. 401K, Barry Honig, Richard Molinsky, and WPCS International Incorporated,

Defendants.

Case No.: 14 Civ. 5226 (DLC)

ECF Case

**NOTICE OF MOTION
TO DISMISS**

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Michael E. Swartz, dated September 24, 2014, Defendant Hudson Bay Master Fund Ltd. hereby moves this Court, before the Honorable Denise L. Cote, in Courtroom 15B at the United States Courthouse, 500 Pearl St., New York, New York 10007, on a date and at a time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing with prejudice the Complaint to the extent it is asserted against Hudson Bay Master Fund Ltd. on the basis that Plaintiff has failed to state a claim upon which relief may be granted, and granting any such relief as this Court deems just and proper.

Dated: New York, New York
September 24, 2014

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